

OFFICE OF THE COMPTROLLER OF THE CURRENCY
RECORDS MANAGEMENT
PRIVACY IMPACT ASSESSMENT

A. Contact Information

- **Name of system/application:** Records Management
- **Office of Responsibility:** Records Management / Office of Management
- **Contact information of the person completing this document, (Name, title, organization and contact information):**
Nina C. Alexander
IT Special Initiatives Program Manager
Information Technology Services
202-874-1023
Nina.Alexander@occ.treas.gov
- **Contact information of the System or Program Manager, (Name, title, organization and contact information):**
Sherry Smith
Records Management
Office of the Comptroller of the Currency
202-874-4418
Sherry.Smith@occ.treas.gov

[Effective July 11, 2006 contact:
Susan Sallaway
202-874-5076
susan.sallaway@occ.treas.gov]

B. Qualification Questions:

- 1) Does this system collect any personal information in identifiable form about individuals?
Yes
- 2) Does the public have access to the system? **No**
- 3) Has a PIA been done before? **Yes, for parts of the system (i.e., those covered by a System of Records report)**
- 4) Has it been at least three years since the last PIA was performed? **Yes, for parts of the system**

OFFICE OF THE COMPTROLLER OF THE CURRENCY
RECORDS MANAGEMENT
PRIVACY IMPACT ASSESSMENT

5) Has the system changed since the last PIA was performed? **Yes**

C. Data in the System/Application

- **Describe the information to be collected, why the information is being collected, the intended use of the information, and with whom the information will be shared.**

A Major Application that provides program code, business logic in support of the management of records of what the OCC does and how it conducts its business. The components of the application provide the repository of information that allows OCC to track, manage, report, store and dispose of agency records. There is no Privacy Act information in STAR. The only Privacy Act information we interact with originates from the business units who create those records.

- **What are the sources of the information in the system?**

Records Management, government agencies, and OCC employees

- **How will the data collected from sources other than Federal agency records or the individual be verified for accuracy?**

No individually identifiable personal information is collected from entities outside the Federal Government.

- **Who will have access to the data and how is access determined?**

Access is determined on a need-to-know or role basis. Please refer to the OCC Records Management Security Plan.

- **Describe the administrative and technological controls that are in place or that are planned to secure the information being collected.**

The Records Management major application has management, operational, and technical controls in place to secure collected information. Some of the areas of protection include: Rules of Behavior, Security controls, Security Awareness Training, Physical and Environmental controls, Production Input/Output controls, Contingency Planning, Data Integrity controls, Identification and Authentication controls, and Logical Access controls. Refer to the Chief Counsel security plan for further details for protection controls.

- **What opportunities will individuals have (if any) to decline to provide information or to consent to particular uses of the information?**

The Records Management applications do not directly collect Privacy Act information from members of the public. Human Resources policies address what rights employees have to decline or access the information they provide.

- **What is the life expectancy of the data and how will it be disposed of when it is no longer needed?**

OFFICE OF THE COMPTROLLER OF THE CURRENCY
RECORDS MANAGEMENT
PRIVACY IMPACT ASSESSMENT

The life expectancy varies by application. In some cases, this is governed by statute or regulation.

- **Does the collection of this information require a new system of records under the Privacy Act (5 U.S.C. § 552a) or an alteration to an existing system of records?**

No

The Following OCC Officials Have Approved this Document:

_____	<u>12/13/2004</u>
SIGNATURE	DATE

_____	<u>12/13/2004</u>
SIGNATURE	DATE